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14 Attorneys for Len Co, LLC, Alleged Debtor

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16 **UNITED STATES BANKRUPTCY COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN JOSE DIVISION**

19 In re: Case No. 18-52484

20 LEN CO, LLC,

21 Alleged Debtor.

**SUPPLEMENTAL DECLARATION OF  
LEONID PERELMAN IN SUPPORT OF  
JOINT OPPOSITION TO PETITIONING  
CREDITOR'S NOTICE OF MOTION  
AND MOTION FOR SUMMARY  
JUDGMENT AND ENTRY OF ORDER  
FOR RELIEF AGAINST LEN CO, LLC**

24 Date: January 23, 2019  
25 Time: 1:00 p.m.  
26 Place: Courtroom 3020  
27 280 South First Street  
San Jose, California 95113

1           I, Leonid Perelman, declare as follows:

2           1.       I know each of the following facts to be true of my own personal knowledge,  
3 except as otherwise stated, and if called as a witness, I could and would competently testify with  
4 respect thereto. I am submitting this declaration in further support of the *Opposition to*  
5 *Petitioning Creditor's Notice of Motion and Motion for Summary Judgment and Entry of Order*  
6 *for Relief Against Len Co, LLC* (the “Opposition”). Capitalized terms used but not otherwise  
7 defined herein shall have the meanings ascribed to such terms in the Opposition.

8           2.       I am the sole member of Len Co, LLC, a Delaware limited liability company  
9 (“Len Co”), and I am familiar with Len Co’s bank account statements and wire transfers.

10          3.       Attached as Exhibit A is a true and correct copy of Len Co’s Citibank bank  
11 statement covering the period of December 1 – 31, 2017.

12          4.       Attached as Exhibit B is a true and correct copy of the wire transfer  
13 confirmations associated with certain wire transfers occurring on December 29, 2017. Account  
14 number information from this document has been redacted for purposes of this filing.

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1 I declare under penalty of perjury that the foregoing is true and correct.  
2 Executed on this 21st day of January 2019 in Los Angeles, California.

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Leonid Perelman

# Exhibit A

Citibank CBO Services 942  
P.O. Box 6201  
Sioux Falls, SD 57117-6201

001/R1/04F013

000  
CITIBANK, N. A.  
**Account**  
**205799554**

LEN CO, LLC  
3031 TISCH WAY, STE 130  
SAN JOSE CA 95128

**Statement Period**  
**Dec 1 - Dec 31, 2017**

Page 1 of 1

## CitiBusiness® ACCOUNT AS OF DECEMBER 31, 2017

### Relationship Summary:

Checking	<b>\$602,029.27</b>
Savings	-----
Checking Plus	-----

## CHECKING ACTIVITY

### CitiBusiness Checking

205799554		Beginning Balance:	\$1,010,185.79	
		Ending Balance:	\$602,029.27	
Date	Description	Debits	Credits	Balance
12/04	ACH DEBIT ONLINE PAYROLL PAYROLL 0214467 Dec 04	44.99		1,010,140.80
12/27	CBUSOL TRANSFER DEBIT Donation on behalf of A and LPerelman	10,000.00		1,000,140.80
12/28	WIRE TRANSFER WIRE FROM KNIGHT CAPITAL FUNDING Dec 28		6,190,000.00	7,190,140.80
12/28	ACH DEBIT PAYROLL SERVICE 5Z2X 5Z2X 5Z2X Dec 28	35,075.07		7,155,065.73
12/29	CBUSOL INTERNATIONAL WIRE OUT	567,071.61		6,587,994.12
12/29	CBUSOL INTERNATIONAL WIRE OUT	5,682,672.40		905,321.72
12/29	CBUSOL TRANSFER DEBIT Mike Interest on Bridge Notes	19,652.64		885,669.08
12/29	CBUSOL TRANSFER DEBIT Mike share of LenCo pf	283,535.81		602,133.27
12/29	ACH DEBIT ONLINE PAYROLL PAYROLL 4315542 Dec 29	104.00		602,029.27
<b>Total Debits/Credits</b>		<b>6,598,156.52</b>	<b>6,190,000.00</b>	

## CUSTOMER SERVICE INFORMATION

### IF YOU HAVE QUESTIONS ON:

Checking

### YOU CAN CALL:

877-528-0990\*  
(For Speech and Hearing  
Impaired Customers Only  
TDD: 800-945-0258)

### YOU CAN WRITE:

Citibank, N.A.  
P.O. Box 790184  
St Louis, MO 63179

For change in address, call your account officer or visit your branch.

\* To ensure quality service, calls are randomly monitored.

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# Exhibit B

Thank you for your request. Your transaction is still pending..

All transactions are subject to routine review and approval before they can be released. No further action is required from you at this time.

Status: Processed - Confirmation Number is 20173620030920.

**Source Account**

Account: Len Co, #\*\*\*\*\*9554 (Checking)

**Scheduling**

Immediately upon approval

**Destination**

Wire initiated using model: STM HOLDINGS SARL (CLEAN CAPITAL)

Amount:	\$567,071.61
Beneficiary:	STM HOLDINGS SARL
Account:	REDACTED
Bank:	UBI BANCA INTERNATIONAL S.A. 37A, AVENUE J.F. KENNEDY LUXEMBOURG Luxembourg SWIFT/BIC: CABILULL
Special Instructions:	JP Morgan Chase Bank NA 4 New York Plaza, NY, NY 10004 Swift: CHASUS33XXX

**Customer Reference Number**

Customer Reference Number:

LenCoPrinc

Additional Reference:

PrincipalRepay

[Set Up Another Wire](#)

## Wire Instruction Confirmation

Thank you for your request. Your transaction is still pending..

All transactions are subject to routine review and approval before they can be released. No further action is required from yo

Status: Processed - Confirmation Number is 20173620016218.

### Source Account

Account: Len Co, #\*\*\*\*\*9554 (Checking)

### Scheduling

Immediately upon approval

### Destination

Wire initiated using model: STM HOLDINGS SARL (INCOME ACCOUNT)

Amount: \$5,682,672.40

Beneficiary: STM HOLDINGS SARL

Account: REDACTED

Bank: UBI BANCA INTERNATIONAL S.A.  
37A, AVENUE J.F. KENNEDY  
LUXEMBOURG Luxembourg  
SWIFT/BIC: CABILULL

Special Instructions: JP Morgan Chase Bank NA  
4 New York Plaza, NY, NY 10004  
Swift: CHASUS33XXX

### Customer Reference Number

Customer Reference Number:

LenColInter

Additional Reference:

InterestPmt